

EXHIBIT S

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re: Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
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This document relates to:

Burnett, et al. v. Islamic Republic of Iran, No. 15-cv-9903 (GBD)(SN)

DECLARATION OF KERRI KELLY

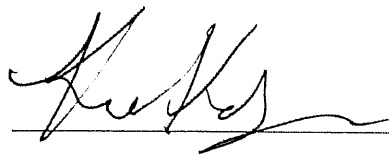
I, KERRI KELLY, hereby declare under penalty of perjury as follows:

1. I am 44 years old and reside in Topanga, California.
2. I am the stepdaughter of Joseph (“Joe”) Leavey who was killed in the September 11, 2001 terrorist attacks on the World Trade Center in New York where, as a Lieutenant with the New York City Fire Department, he responded to the call of duty.
3. Joe Leavey came into my life when I was six years old when he and my mother began seeing each other.
4. I was eight years old when my mother and Joe were married and we began living together as a family. I resided in our family home with my mother and Joe for the next seventeen years of my life.
5. Throughout those seventeen years, Joe was the father figure in my life. My biological father separated from my mother when I was two years old and I never lived with my biological father.
6. From the time he and my mother were married, until he died on September 11, 2001, Joe assumed all the responsibilities of a father to me.
7. When Joe was not working at the firehouse, he played Mr. Mom for me, my mom, and my brother and sister. He cooked, attended our school meetings, ran the PTA and numerous other daily tasks. My mom worked 9-5 so Joe was our primary caregiver throughout the day.
8. Joe drove me to school each morning as I was growing up
9. Joe taught me how to swim. He taught me how to throw and catch a ball, and attended my softball games as I was growing up.

10. Joe helped me with my homework throughout my years as a student. He attended school events with me and attended all my dance recitals.
11. Joe taught me to drive a car when I reached the appropriate age.
12. Joe taught me to balance my first checkbook, and always stressed the importance of saving for the future.
13. Joe walked me down the aisle when I was married in 2000, just one year before he died.
14. Joe taught me right from wrong and stressed the importance of being honest at all times. Joe imparted life's most important lessons to me.
15. Joe kept me safe and protected me. He fed me and clothed me, and always made me feel loved.
16. Joe was a major influence in my becoming the woman I am today. He modeled what it was to be of service. Not just as a fireman, but as a neighbor, a church goer and a community member. I followed in his footsteps, dedicating my life to community service.
17. Losing Joe changed my life and I will never be the same. It is a loss I feel everyday.
18. Joe Leavey was my father in every way possible.

I declare under penalty of perjury that the foregoing is true and correct.

Date: 8-26-19

A handwritten signature in black ink, appearing to read 'Kerri Kelly', written over a horizontal line.

Kerri Kelly